

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
	)	
BOY SCOUTS OF AMERICA AND	)	Case No. 20-10343 (LSS)
DELAWARE BSA, LLC, <sup>1</sup>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	
	)	
	)	

**NOTICE OF APPEAL**

**PLEASE TAKE NOTICE** that K.S. and J.H. submit this notice of appeal in conformity with Bankruptcy Form B417A, and in accordance with USCS Bankruptcy R 8002(3).

**Part 1: Identity of Appellant(s)**

1. Names of Appellants: J.H. and K.S.
2. Position of Appellant in the bankruptcy case: Creditor (sex abuse claimant)

**Part 2: Identify the Subject of this Appeal**

1. Describe the judgment, orders, or decree appealed from:

*Order Denying Motion to Change Election to Opt Into Expedited Payment/Convenience Class.* (D.I. 11797) and accompanying *Opinion* (D.I. 11789) and all other subsumed judgments, orders, and decrees brought up for review in the appeal.

A copy of the Order is attached hereto as **Exhibit A** and a copy of the Opinion is attached hereto as **Exhibit B**.

2. State the date on which the judgment, order, or decree was entered.

The Order was entered on February 5, 2024 and the Opinion was entered the same day on February 5, 2024. Claimant J.D. filed a Notice of Appeal on February 16, 2024. (D.I. 11831).

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<sup>1</sup> The Debtors in these Chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

**Part 3: Identify the Other Parties to the Appeal**

The other parties to the Order and Opinion, and the names, addresses, and telephone numbers of their attorneys are as follows:

<p>J.H. and K.S.  <b>(Appellants)</b></p>	<p><b>JACOBS &amp; CRUMPLAR, P.A.</b> David Crumplar (#5876) 750 Shipyard Dr, Suite 200 Wilmington, DE 19801 Phone: (302) 656-5445 Email: <a href="mailto:davy@jcdelaw.com">davy@jcdelaw.com</a></p> <p>-and-</p> <p><b>BABIN LAW LLC</b> Ashley Crowell (pro hac vice forthcoming) 7014 E Camelback Road Suite B100A, #76 Scottsdale, AZ 85251 Phone: (480)716-4477 Email: <a href="mailto:ashley.crowell@babinlaws.com">ashley.crowell@babinlaws.com</a></p>
<p>Boy Scouts of America, and  Delaware BSA, LLC  <b>(Debtors)</b></p>	<p><b>MORRIS, NICHOLS, ARSHT &amp; TUNNELL LLP</b> Derek C. Abbott Andrew R. Remming Paige N. Topper Tori L. Remington 1201 North Market Street, 16th Floor P.O. Box 1347 Wilmington, Delaware 19899-1347 Telephone: (302) 658-9200 Email: <a href="mailto:dabbot@morrisnichols.com">dabbot@morrisnichols.com</a> <a href="mailto:aremming@morrisnichols.com">aremming@morrisnichols.com</a> <a href="mailto:ptopper@morrisnichols.com">ptopper@morrisnichols.com</a> <a href="mailto:tremington@morrisnichols.com">tremington@morrisnichols.com</a></p> <p>– and –</p> <p><b>WHITE &amp; CASE LLP</b> Jessica C. Lauria 1221 Avenue of the Americas New York, New York 10020 Telephone: (212) 819-8200 Email: <a href="mailto:jessica.lauria@whitecase.com">jessica.lauria@whitecase.com</a></p>

	<p>– and –</p> <p><b>WHITE &amp; CASE LLP</b>  Michael C. Andolina  Matthew E. Linder  Laura E. Baccash  Blair M. Warner  111 South Wacker Drive  Chicago, Illinois 60606  Telephone: (312) 881-5400  Email: mandolina@whitecase.com  mlinder@whitecase.com  laura.baccash@whitecase.com  blair.warner@whitecase.com</p>
<p>Barbara J. Houser, in  her capacity as  Trustee of the BSA  Settlement Trust</p> <p><b>(Appellees)</b></p>	<p><b>PACHULSKI STANG ZIEHL &amp; JONES LLP</b>  Richard M. Pachulski  Debra I. Grassgreen  James E. O’Neill  919 North Market Street, 17th Floor  P.O. Box 8705  Wilmington, DE 19899-8705 (Courier 19801)  Telephone: (302) 652-4100  Email: rpachulski@pszjlaw.com  dgrassgreen@pszjlaw.com  joneill@pszjlaw.com</p> <p>– and –</p> <p><b>GILBERT LLP</b>  Kami E. Quinn (admission pro hac vice)  Emily P. Grim (admission pro hac vice)  Sarah A. Sraders (admission pro hac vice)  700 Pennsylvania Avenue  SE Suite 400  Washington, DC 20003  Telephone: (202) 772-2200  Facsimile: (202) 772-3333  Email: quinnk@gilbertlegal.com  grime@gilbertlegal.com  sraderss@gilbertlegal.com</p>

**Part 4: Optional election to have appeal heard by District Court**

Appellants do not elect for the District Court to hear the appeal.

**Part 5: Sign Below**

/s/ Davy Crumplar

/s/Ashley Crowell

Signature of attorneys for appellant

Name, address, and telephone number of attorney:

**JACOBS & CRUMPLAR, P.A.**

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